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 SDC - BALTIMORE  
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**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**
**v.**
**VERENA MAY MATHIS,**
**Defendant.**
**CRIMINAL NO. 8:24-cr-75-MJM**
**(Sexual Exploitation of a Child,  
 18 U.S.C. § 2251(a); Child Sex Trafficking,  
 18 U.S.C. § 1591(a), (b)(1); Forfeiture, 18  
 U.S.C. §§1594(d) and 2253, 21 U.S.C. §  
 853(p), 28 U.S.C. § 2461(c))**

**INDICTMENT**

**COUNT ONE**

**(Sexual Exploitation of a Child)**

The Grand Jury for the District of Maryland charges that:

**General Allegations**

1. Defendant **VERENA MAY MATHIS** ("MATHIS") was born in 1999 and resided in Maryland.
2. Minor Victim was born in 2019 and was approximately eighteen months old at the time of the offenses against her.

**The Charges**

3. On or before December 5, 2020, in the District of Maryland and elsewhere, the defendant,

**VERENA MAY MATHIS,**

did knowingly employ, use, persuade, induce, entice, and coerce a minor female to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using any means and facility of interstate and foreign commerce, said visual depictions were produced and transmitted using

materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, and such visual depictions have actually been transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, that is, two video files and one image file depicting Minor Victim's genitals and anus, said video files having been stored in the Google account "darksideofprince2286@gmail.com."

18 U.S.C. § 2251(a)

18 U.S.C. § 2

**COUNT TWO**  
**(Sex Trafficking of Children)**

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs One and Two of Count One are incorporated here.
2. On or before December 5, 2020, in the District of Maryland and elsewhere, the defendant,

**VERENA MAY MATHIS,**

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, maintain, patronize and solicit by any means any person, to wit: Minor Victim, and did benefit financially from participation in a venture engaged in such acts, knowing and in reckless disregard of the fact that Minor Victim had not attained the age of 14 years and would be caused to engage in a commercial sex act.

18 U.S.C. § 1591(a), (b)(1)

18 U.S.C. § 2

### **FORFEITURE ALLEGATION**

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. §§ 1594(d) and 2253, 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), in the event of a defendant's conviction on any of the offenses charged in Counts One through Three of this Indictment.

#### **Sexual Exploitation of Children Forfeiture**

2. Upon conviction of any of the offenses set forth in Count One of this Indictment, the defendant,

**VERENA MAY MATHIS,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 2253(a):

a. any visual depiction described in Title 18, United States Code, Sections, 2251, 2251A, 2252, or 2252A, 2252B, or 2260 or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, received, or possessed in violation of Title 18, United States Code, Chapter 110;

b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

c. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

#### **Trafficking in Persons Forfeiture**

3. Upon conviction of any of the offenses set forth in Count Two of this Indictment, the defendant,

**VERENA MAY MATHIS,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 1594 (a) and (d):

a. any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation, and any property traceable to such property; and

b. any property, real or personal, constituting or derived from, any proceeds that such person obtained, directly or indirectly, as a result of such violation, or any property traceable to such property.

**Property Subject to Forfeiture**

4. The property to be forfeited includes, but is not limited to, the following items seized from the defendant's residence in Washington, D.C. on or about February 15, 2024:

- a. Apple iPhone 15+, serial number LFK9D6VX2T;
- b. blue Motorola cellphone with cracked screen; and
- c. Cloud Mobile cellphone.

**Substitute Assets**

5. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be subdivided without difficulty;

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C.

§ 853(p), as incorporated by 18 U.S.C. § 2253(b) and 28 U.S.C. § 2461(c).

18 U.S.C. §§ 1594 (a) and (d), 2253

21 U.S.C. § 853(p)

28 U.S.C. § 2461(c)

*Erek L. Barron*

Erek L. Barron

United States Attorney

• TRUE BILL •

**SIGNATURE REDACTED** 7

FOREPERSON

3/5/24

Date